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FILED IN THE U.S. DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

MAY 10 2022

SEAN F. MCAVOY, CLERK  
\_\_\_\_\_, DEPUTY  
YAKIMA, WASHINGTON

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

**1:22-CR-2050-SAB**

INDICTMENT

v.  
NICHOLAS MEDELEZ,

Defendant.

Vio.: 21 U.S.C. § 841(a)(1),  
(b)(1)(B)(viii)  
Distribution of 5 Grams or More of  
Actual (pure) Methamphetamine  
(Counts 1, 3)

21 U.S.C. § 841(a)(1),  
(b)(1)(C)  
Distribution of 50 Grams or More  
of Actual (pure) Methamphetamine  
(Count 2)

21 U.S.C. § 853  
Forfeiture Allegation

The Grand Jury charges:

COUNT 1

On or about April 6, 2021, in the Eastern District of Washington, the Defendant,  
NICHOLAS MEDELEZ, knowingly and intentionally distributed 5 grams or more of  
actual (pure) methamphetamine, a Schedule II controlled substance, in violation of 21  
U.S.C. § 841(a)(1), (b)(1)(B)(viii).

1 COUNT 2

2 On or about May 7, 2021, in the Eastern District of Washington, the Defendant,  
3 NICHOLAS MEDELEZ, knowingly and intentionally distributed 50 grams or more of  
4 actual (pure) methamphetamine, a Schedule II controlled substance, in violation of 21  
5 U.S.C. § 841(a)(1), (b)(1)(A)(viii).

6 COUNT 3

7 On or about September 9, 2021, in the Eastern District of Washington, the  
8 Defendant, NICHOLAS MEDELEZ, knowingly and intentionally distributed 5 grams or  
9 more of actual (pure) methamphetamine, a Schedule II controlled substance, in violation  
10 of 21 U.S.C. § 841(a)(1), (b)(1)(B)(viii).

11 NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS

12 The allegations contained in this Indictment are hereby realleged and  
13 incorporated by reference for the purpose of alleging forfeitures.

14 Pursuant to 21 U.S.C. § 853, upon conviction of an offense(s) in violation of 21  
15 U.S.C. § 841, as set forth in this Indictment, the Defendant, NICHOLAS MEDELEZ,  
16 shall forfeit to the United States of America, any property constituting, or derived from,  
17 any proceeds obtained, directly or indirectly, as the result of such offense(s) and any  
18 property used or intended to be used, in any manner or part, to commit or to facilitate the  
19 commission of the offense.

20 If any forfeitable property, as a result of any act or omission of the Defendant:

- 21 a. cannot be located upon the exercise of due diligence;  
22 b. has been transferred or sold to, or deposited with, a third party;  
23 c. has been placed beyond the jurisdiction of the court;  
24 d. has been substantially diminished in value; or  
25 e. has been commingled with other property which cannot be divided  
26 without difficulty,

1 the United States of America shall be entitled to forfeiture of substitute property pursuant  
2 to 21 U.S.C. § 853(p).  
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4 DATED: this 10 day of May 2022.  
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9 Vanessa Waldref  
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11 United States Attorney

12 TJH  
13 Thomas J. Hanlon  
14 Assistant United States Attorney  
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